



VIA EMAIL

January 9, 2023

Jeremy Comeau
Assistant General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St., Ste. 1500 East
Indianapolis, IN 46204

Re: LSA Document #22-324/Economic Impact Statement

Dear Mr. Comeau,

Pursuant to Indiana Code 4-22, as the Small Business Ombudsman for the state of Indiana, I have reviewed the proposed rule and economic impact analysis for small businesses associated with the rule changes contained in LSA Document #22-324 (proposed rule) proposed by the Indiana Utility Regulatory Commission (IURC), and found the following to be true.

Proposed rule LSA #22-324 increases pipeline safety operator recordkeeping timelines from a minimum of five years to seven years, requires certain Operator Qualification training programs that includes training for utilized tools and equipment, and requires operator response to Pipeline Safety Division areas of concern. All of these requirements found within the proposed rule appear to be within routine duties of operators involved in Indiana's gas utility industry. Additionally, the proposed rule appears to have minimal economic impact to gas operators considered small businesses, and is proposed out of necessity with as efficient and least stringent compliance requirements as possible. The Indiana Small Business Ombudsman recognizes the inherent safety concerns associated with pipeline safety and believes LSA #22-324, as proposed, will meet or increase Indiana's pipeline safety standards while maintaining federal funding and meeting statutory obligations.

Based upon this statement and review, the Indiana Small Business Ombudsman supports the proposed rule related to the economic impact to small business if the IURC conclusion reflects the actual result after promulgation. If there are any questions about these comments, please contact me at majaworowski@iedc.in.gov.

Sincerely,

Matt Jaworowski
Small Business Ombudsman
Manager, Interagency Affairs
Indiana Economic Development Corporation